

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

AKIVA GRUNEWALD,

Defendant.

CR No. 2:23-cr-00618-SVW

I N F O R M A T I O N

[18 U.S.C. § 666(a)(2): Bribery
Concerning Programs Receiving
Federal Funds]

The United States Attorney charges:

[18 U.S.C. § 666(a)(2)]

A. THE MANZANITA BAND OF THE KUMEYAAY NATION

At times relevant to this Information:

1. The Manzanita Band of the Kumeyaay Nation was a federally recognized tribe ("Manzanita Tribe").

2. The reservation for the Manzanita Tribe ("Manzanita Reservation") was located in southeastern San Diego County, California.

3. The Manzanita Tribe received federal assistance in excess of \$10,000 for each of the calendar years 2017, 2018, and 2019 in the form of federal grants from the U.S. Department of Interior, Bureau of Indian Affairs, Office of Self Governance.

1 4. In 2012, Chief A, who was not a member of the Manzanita
2 Tribe, founded the Manzanita Tribal Police Department ("Manzanita
3 PD"), and thereafter served as its Chief of Police until 2018, when
4 he stepped down in title only.

5 5. In February 2020, the Manzanita Tribe terminated the
6 Manzanita PD and its relationship with Chief A.

7 B. THE BADGES-FOR-MONEY SCHEME

8 At times relevant to this Information:

9 6. Beginning in or around 2016, Chief A and other members of
10 the Manzanita PD ("recruiters") began to solicit wealthy individuals
11 in the Los Angeles area to become members of the Manzanita PD,
12 including defendant AKIVA GRUNEWALD. Defendant GRUNEWALD had no law
13 enforcement experience before joining the Manzanita PD. Chief A and
14 other recruiters would refer to these wealthy individuals as the "VIP
15 Group," the "ghostriders," or the "Admin Bureau." Typically, these
16 individuals were asked to make a large payment, ranging from \$5,000
17 to \$100,000, and sometimes styled as a "donation," in exchange for
18 membership in the Manzanita PD. The individuals who made the
19 payments, including defendant GRUNEWALD, believed that a Manzanita PD
20 badge could grant the holder privileges in connection with the
21 purchase and carrying of firearms, including the ability to carry
22 concealed firearms in California and elsewhere.

23 7. Members of the VIP Group were not expected to perform any
24 law enforcement services for the Manzanita PD and many never visited
25 the Manzanita Reservation at all. To further conceal the scheme,
26 Chief A and other recruiters sometimes would ask the VIP Group to
27 enroll in California POST programs.

1 8. Chief A set up an office space for the Manzanita PD in an
2 office building in El Segundo, California, in Los Angeles County,
3 within the Central District of California, which was approximately
4 177 miles and a several hour drive to the Manzanita Reservation in
5 San Diego County. The office space was located inside the space used
6 by a limousine and car service company. Neither the office space nor
7 the limousine and car service company had any affiliation with or
8 relationship to the Manzanita Tribe.

9 9. At no time was any member of the Manzanita PD also a member
10 of the Manzanita Tribe. At no time was the Manzanita PD recognized
11 by the Bureau of Indian Affairs ("BIA") or the State of California as
12 a cross-deputized police department with federal or state law
13 enforcement authority. At no time did members of the Manzanita PD
14 have the authority to identify themselves either as federal law
15 enforcement officers, state law enforcement officers, or peace
16 officers, and at no time did the Manzanita PD have the authority to
17 engage in any law enforcement activities off the Manzanita
18 Reservation.

19 10. Chief A and others issued badges and credentials reflecting
20 membership to the Manzanita PD, including defendant GRUNEWALD. Most
21 members of the Manzanita PD, including defendant GRUNEWALD, lived in
22 the Los Angeles area, hours away from the Manzanita Reservation.
23 While off the Manzanita Reservation, many persons who purchased
24 Manzanita PD memberships, including defendant GRUNEWALD, sought to
25 avail themselves of privileges available to federal and state law
26 enforcement officers, including using Manzanita PD credentials to
27 acquire firearms and carry concealed firearms.

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1 C. DEFENDANT'S PAYMENT FOR A BADGE

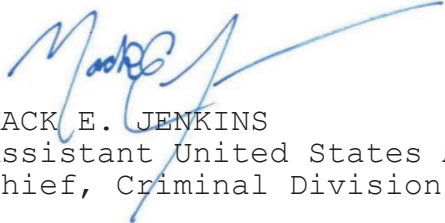
2 11. On or about July 31, 2018, in Los Angeles County, within
3 the Central District of California, defendant AKIVA GRUNEWALD
4 corruptly gave, offered, and agreed to give something of value to
5 Chief A, the Chief of Police for the Manzanita Tribal Police
6 Department and an agent of the Manzanita Band of Kumeyaay Nation,
7 which received benefits in excess of \$10,000 under a Federal program
8 involving a grant, contract, subsidy, loan, guarantee, insurance, and
9 other form of Federal assistance during the one-year period from
10 January 2018 to January 2019, intending to influence and reward Chief
11 A in connection with a business, transaction, and series of
12 transactions of the Manzanita Band of Kumeyaay Nation having a value
13 of \$5,000 or more. Specifically, defendant GRUNEWALD corruptly gave,
14 offered, and agreed to give to Chief A \$20,000 via a personal check
15 written to Chief A, intending to influence and reward Chief A in

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1 connection with Chief A using his official position to issue a tribal
2 law enforcement badge and credentials to defendant GRUNEWALD.

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